

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

CASE NO. 2013-00-00237

In the Matter of:

**Application of Kentucky Water
Service Corporation of Kentucky
For An Adjustment of Rates**

REQUEST TO INTERVENE

Comes the undersigned, counsel for Hickman County, Kentucky, by and through its Fiscal Court, and respectfully moves the Commission to allow the HICKMAN COUNTY FISCAL COURT to intervene in the above styled action.

The Hickman County Fiscal Court voted on September 9, 2013 to file an intervention in the above styled case for the following reasons:

1. Hickman County Detention Center is the largest single consumer of water in the county and possibly in the Applicant's area of customer base. The Hickman County Detention Center, a seventy-five (75) bed jail, spends an average of \$1548.29 monthly on water. Costs for water usage by the Hickman County Detention Center for 2012 were \$18579.53.

2. Other public buildings for which the Hickman County Fiscal Court pays water usage are for 2010:

- a. Hickman County Courthouse the sum of \$2022.00
- b. Hickman County Courthouse Annex the sum of \$1033.44; and
- c. Hickman County Road Department the sum of \$ 448.52

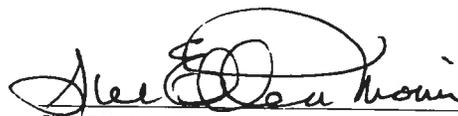
d. Hickman County Judge Executive Office building the sum of \$1087.46

3. Higher rates will make it even more difficult to recruit new industry and retain current industry.

4. Approximately 21% of the citizens of Hickman County are over the age of 65. Most of these senior citizens are on a fixed income and increased water rates would be a substantial burden to them and may endanger their physical well being.

5. Recent population numbers show a continued decline in population. Many have indicated within the last two years that the high cost of water and sewer utilities would cause them to consider moving if possible.

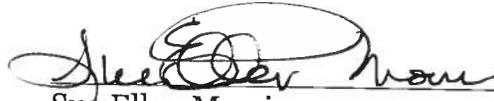
The undersigned requests Hickman County Fiscal Court be allowed to intervene to present issues unique to the fiscal impact on county government, to be allowed to present expert testimony, if feasible, related to the effect of the proposed rate increase, and to be allowed to participate as a party in the above styled action.



SUE ELLEN MORRIS
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1-270-653-6335

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing Request to Intervene was served upon Water Service Corporation of Kentucky by first class mailing, postage prepaid, to its counsel of record: John N. Hughes, Esq., 124 West Todd St., Frankfort, Kentucky, 40601, counsel for Water Service Corporation of Kentucky, Inc. and to Public Service Commission, 211 Sower Boulevard, P. O. Box 615, Frankfort, Kentucky, and Office of the Attorney General of Kentucky, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky, 40601, and Hon. Gregory D. Pruitt, Judge Executive of Hickman County, 116 South Jefferson, Clinton, KY 42031, this 10th day of October, 2013.



Sue Ellen Morris
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